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Prepped by Ollie Stewart

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**KERR-MCGEE REFINING CORPORATION**

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RAY A. FREELS

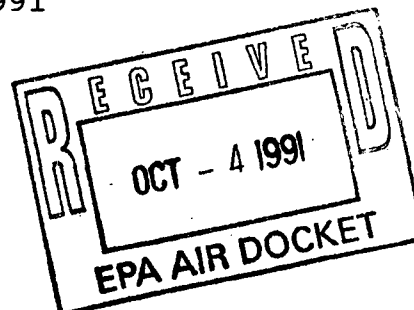
PRESIDENT

PHONE

713 638-4700

September 30, 1991

U. S. Environmental Protection Agency
Docket A-91-46
Air Docket (LE-131)
401 M Street, S.W., Room M-1500
Washington, DC 20460



Gentlemen:

Kerr-McGee Refining Corporation (KMRC) has reviewed Ethyl Corporation's waiver application to the United States Environmental Protection Agency seeking permission to use HiTec 3000 Performance Additive in unleaded gasoline. Based on the extensive test results and the use experience for the compound in Canada, KMRC supports the use of Ethyl's manganese product. The product provides efficiencies from business and crude supply standpoints. Thus, KMRC requests that the EPA approve the use of HiTec 3000 in all domestic use unleaded gasolines.

With the octane boost provided by the small amounts of additive needed, our refinery gasoline conversion units' severities can be reduced while still maintaining the higher quantity of high octane gasoline being produced with the same quantity of feed. This ability to produce more gasoline for market ultimately results in less costly gasoline for the consumer.

Kerr-McGee Refining Corporation supports use of the additive and appreciates EPA's review for use.

Very truly yours,

KERR-MCGEE REFINING CORPORATION

Ray A. Freels

RAF/hjn

Copy to Ms. Mary T. Smith, Director
Field Operations & Support Division (EN-397F)
U. S. Environmental Protection Agency
401 M Street S. W.
Washington, DC 20460